

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION**

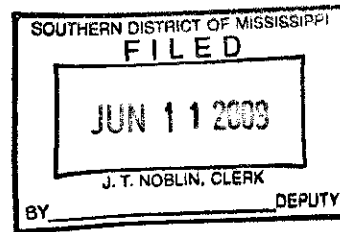
PRIME TABLE GAMES LLC, a Nevada
limited liability company

Plaintiff,

v.

NATIONAL TABLE GAMES
CORPORATION, formerly known as
GAMMAX, INC., a Louisiana corporation,

Defendant.



Case No.

3:09cv346 HTW-LRA

JURY TRIAL DEMANDED

**COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF
FOR PATENT INFRINGEMENT**

Plaintiff Prime Table Games, LLC ("Plaintiff" or "Prime"), alleges the following for its complaint against Defendant National Table Games Corporation ("Defendant").

I. NATURE OF THE CASE

1. This is a civil action for damages and injunctive relief for patent infringement.

II. JURISDICTION AND VENUE

2. This action arises under the patent laws of the United States, particularly Sections 271 and 281-285 of the Patent Code (35 U.S.C. §§ 271, 281-285). This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1338.

3. Venue is proper under 28 U.S.C. §§ 1391(b) and (c) and personal jurisdiction exists over the Defendant based on the following facts. Defendant is a corporation which resides in this judicial district, may be found in this district, has transacted substantial business in this District and is subject to the personal jurisdiction of this Court. A substantial part of the

events giving rise to the claims asserted occurred in this District and the potential impact of the infringement will be an injury to Plaintiffs' business and property in this state and district. The accused game, Flop Poker, is played in Vicksburg, Biloxi, Tunica, Bay St. Louis and Gulfport, and has been played in Lula, Mississippi. Defendant also has an internet website, available to Mississippi casinos and casino customers, describing and promoting the accused game. Defendant will, if not enjoined, inflict substantial and irreparable damage to Plaintiff's business, revenues and profits including those arising from activities within this District.

III. THE PARTIES

4. Prime is a limited liability company organized and existing under the laws of the State of Nevada, having an office at 7251 West Lake Mead Boulevard, Suite 300-123, Las Vegas, NV 89128. Prime does business in this judicial district and state and is the owner of U.S. Patent No. 6,503,145 (the '145 patent).

5. Defendant is a corporation of the State of Louisiana, with offices at 3501 Severn Ave, # 16, Metairie, LA, 70002. It transacts business and does business in this state and judicial district. Upon information and belief, Defendant is the named owner of Flop Poker in the license for that game with the State of Mississippi gaming authority.

6. Derek Webb ('Webb') is a citizen of the United Kingdom, who conducts business in this judicial district and state. Webb is the inventor of the '145 patent, as well as other proprietary games which are played in Mississippi casinos, and is a 50% owner of Prime.

Hannah O'Donnell ("O'Donnell") is a citizen of the United Kingdom who conducts business in this state and judicial district and is a 50% owner of Prime.

COUNT ONE – PATENT INFRINGEMENT

8. Webb is the inventor and Prime is the owner, by assignment from Webb, of U.S. Patent No. 6,503,145 (the '145 patent, which was issued by the U.S. Patent and Trademark Office on January 7, 2003, a copy of which is attached as Exhibit A.

9. Defendant has been aware of the '145 patent since at least mid-2004.

10. Despite such knowledge, Defendant has introduced, promoted, sold, leased, and offered for sale or lease in Mississippi and elsewhere, a casino table game called Flop Poker, which infringes one or more of the claims of Plaintiff's '145 patent. Such infringement is continuing.

11. Defendant has induced others to infringe, and contributed to the infringement of one or more claims of the '145 patent by its sales, use, offers for sale and promotion of Flop Poker.

12. Plaintiff, and through it Webb and O'Donnell, has been injured, and will continue to be injured by such infringement unless Defendant is enjoined by this Court. Plaintiff is also entitled to its actual damages, including lost profits and, at a minimum, no less than a reasonable royalty, trebled or otherwise enhanced due to the exceptional nature of this case and Defendant's willful infringement. Plaintiff is also entitled to recover its reasonable attorney's fees and costs.

RELIEF SOUGHT

WHEREFORE, Plaintiff prays for judgment:

A. That Defendant has willfully infringed and/or induced infringement and/or contributed to infringement of the '145 patent and that Plaintiff has been, and will continue to be, damaged by such infringement.

B. That Plaintiff will be irreparably damaged by the continuation of the aforesaid patent infringement unless enjoined by this Court.

C. Awarding Plaintiff its compensatory damages, including lost profits and, at a minimum, no less than a reasonable royalty, such damages trebled or otherwise enhanced as result of Defendant's willful infringement and the exceptional nature of this case, plus attorneys fees and costs, and injunctive relief prohibiting any continuation of Defendant's infringement.

D. Awarding such other and further relief as the Court deems just and equitable under the circumstances of this case.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a jury trial on all issues triable by a jury in this action.

Dated: June 14th, 2009

Respectfully submitted,



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